

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

## NOTICE OF MOTION

PLEASE TAKE NOTICE that on **September 12, 2018, at 10:00 a.m.**, or as soon thereafter as counsel may be heard, I shall appear telephonically before the Honorable Thomas M. Lynch or any judge sitting in his stead in Room 3100 of the U.S. Bankruptcy Court for the Northern District of Illinois, Western Division, 327 Church St., Rockford, Illinois 61101, and shall present the Unopposed Motion to Withdraw as Counsel of Record, filed by Joshua B. Kons.

Respectfully submitted,

JOSHUA KONS

By: /s Joshua Kons

Joshua B. Kons

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

In re: TINA JOHNSON,

) Judge Thomas M. Lynch  
)  
Debtor, ) Case No. 17-82868  
)  
) Chapter 7  
)  
)

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PATRICK S LAYNG, U.S. Trustee,

) Adversary No. 18-96018  
)  
Plaintiff, )  
)  
)  
v. )  
)  
MICHAEL C. BURR, JAAFAR LAW )  
GROUP, PLLC, FAIRMAX LAW, )  
MICHAEL JAAFAR, DAVID IENNA, )  
CHRISTINA BANYON, & DAVID )  
CARTER, )  
)  
Defendants. )

**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

Attorney, Joshua Kons (“Kons”), respectfully moves this Court to enter an order allowing him to withdraw as counsel of record on behalf of Adversary Defendants, Michael C. Burr, Jaafar Law Group, PLLC, Fairmax Law, Michael Jaafar and David Ienna (“Defendants”). In support of this motion, Kons respectfully states as follows:

1. Defendants have hired new counsel, Eric D. Kaplan and Stacie E. Barhorst, both of whom have filed their appearances on behalf of Defendants in this Adversary Proceeding. See Docket at nos. 50 and 51.
2. Defendants no longer wish Kons to represent them.
3. Given that Defendants have new counsel of record, this Court should allow Kons

to withdraw as Defendants' counsel of record.

For all the foregoing reasons, this Court should enter an Order allowing Kons to withdraw as counsel of record for Defendants.

Respectfully Submitted,

JOSHUA KONS

By: /s Joshua Kons

Joshua B. Kons

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that this document was filed electronically this 31<sup>st</sup> day of August, 2018. Notice of this filing will be sent to counsel of record at the email address registered with the Court by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Joshua Kons